

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PRISONERS LEGAL ADVOCACY)	
NETWORK,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 23-1397-MN
)	
THE HONORABLE JOHN CARNEY, in his)	
official capacity as Governor of the State of)	
Delaware, THE HONORABLE ANTHONY)	
J. ALBENCE, in his official capacity as State)	
Election Commissioner of the Delaware)	
Department of Elections, and, THE)	
HONORABLE TERRA TAYLOR, in her)	
official capacity as Acting Commissioner of)	
the Delaware Department of Correction,)	
)	
Defendants.)	

MOTION AND PROPOSED ORDER FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves for the admission *pro hac vice* of Jonathan Topaz, Casey Smith and Sophia Lin Lakin of American Civil Liberties Union Foundation, Inc., located at 125 Broad Street, 18th Floor, New York, NY 10004; Stephen D. Hibbard, Aaron M. Francis, Seth H. Victor and Dixie M. Morrison of Proskauer Rose LLP, located at 2029 Century Park E. #2400, Los Angeles, CA 90067; and Michael J. Lebowich and Godfre O. Blackman of Proskauer Rose LLP, located at Eleven Times Square, New York, NY 10036 to represent Prisoners Legal Advocacy Network in this matter.

OF COUNSEL:

Jonathan Topaz
Casey Smith
Sophia Lin Lakin
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Michael J. Lebowich
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Dated: December 20, 2023

/s/ Emily S. DiBenedetto

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-and-

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[PROPOSED] ORDER GRANTING MOTION

IT IS HEREBY ORDERED that counsel's motion for the admission *pro hac vice* of Jonathan Topaz, Casey Smith, Sophia Lin Lakin, Stephen D. Hibbard, Aaron M. Francis, Seth H. Victor, Dixie M. Morrison, Michael J. Lebowich and Godfre O. Blackman is granted.

United States District Judge

Date: _____

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar(s) of New York State, the District Court for the Southern District of New York, the United States Supreme Court, and the Courts of Appeals for the Eighth and Eleventh Circuits, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

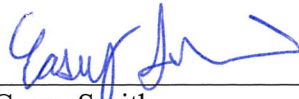
/s/ Jonathan Topaz

Jonathan Topaz
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125 Broad Street, 18th Floor
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jtopaz@aclu.org

Date: Dec. 8, 2023

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar(s) of the State of Florida, New York State, the District Court for the Northern District of Georgia, the District Court for the Northern District of Florida, the District Court for the Southern District of Mississippi, and the Courts of Appeals for the Fifth and Eleventh Circuits, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.



Casey Smith
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Date: 12-19-23

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar(s) of the New York Supreme Court, the Missouri Eastern District, the Eastern District of Wisconsin, the United States Supreme Court, and the Courts of Appeals for the Third, Fourth, Fifth, Sixth, Seventh, Eighth, Tenth and Eleventh Circuits, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

/s/ Sophia Lin Lakin

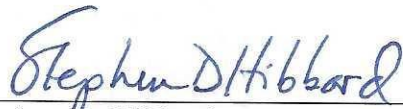
Sophia Lin Lakin
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slakin@aclu.org

Date: Dec. 14, 2023

CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bars of California and New York, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

Date: December 15, 2023

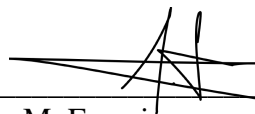


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CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar of New York, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

Date: December 4, 2023



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CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar of California, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

Date: November 30, 2023



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CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar of California, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

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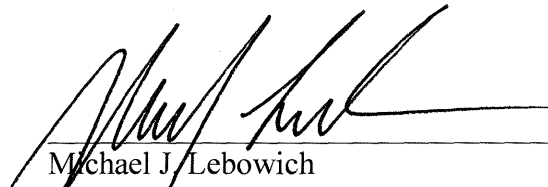


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CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

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Date: December 14, 2023

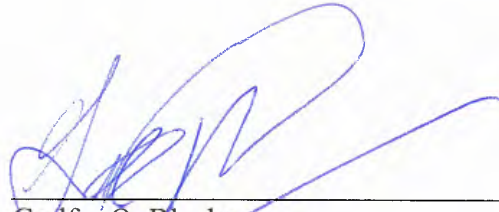


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CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court and am admitted, practicing and in good standing as a member of the Bar of New York, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective September 1, 2016, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's office upon the filing of this motion.

Date: December 4, 2023



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